

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

**KAREN WRIGHT and
GILEY WRIGHT**

Plaintiffs,

vs.

No. 1-04-1313 T/An

WALGREEN CO.

Defendant.

JOINT ~~PROPOSED~~ RULE 16(b) SCHEDULING ORDER

Pursuant to the scheduling conference set by written notice, the following dates are established as the final dates for:

INITIAL DISCLOSURES (RULE 26(a)(1)): June 10, 2005

JOINING PARTIES FOR PLAINTIFF: July 26, 2005

JOINING PARTIES FOR DEFENDANT: August 26, 2005

AMENDED PLEADINGS FOR PLAINTIFF: July 26, 2005

AMENDED PLEADINGS FOR DEFENDANT: August 26, 2005

COMPLETING ALL DISCOVERY: November 30, 2005

**(a) REQUESTS FOR PRODUCTION, INTERROGATORIES AND REQUESTS
FOR ADMISSIONS: November 30, 2005**

(b) EXPERT DISCLOSURE (Rule 26(a)(2):
(i) Plaintiff's Expert: September 30, 2005
(ii) Defendant's Expert: October 31, 2005
(iii) Supplementation under Rule 26(e): November 10, 2005

(c) DEPOSITIONS OF EXPERTS: November 30, 2005

FILING DISPOSITIVE MOTIONS: January 17, 2006

FILED BY *46* D.C.
05 MAY 12 AM 10:53
ROBERT R. PI. TROUD
CLERK OF U.S. DIST. CT.
W.D. OF TN-JACKSON

12

FINAL LISTS OF WITNESSES AND EXHIBITS (Rule 26(a)(3)):

- (c) For Plaintiff: **March 1, 2006**
- (d) For Defendant: **March 1, 2006**

The parties shall have ten (10) days after service of final lists of witnesses and exhibits to file objections under Rule 26(a)(3).

The trial of this matter is expected to last three (3) days and is set for **Jury Trial on April 17, 2006 at 9:30 a.m.** A joint pretrial order is due on **March 31, 2006**. In the event the parties are unable to agree on a joint pretrial order, the parties must notify the Court at least ten (10) days before trial.

OTHER RELEVANT MATTERS:

Interrogatories, Requests for Production and Requests for Admissions must be submitted to the opposing party in sufficient time for the opposing party to respond by the deadline for completion of discovery. For example, if the FRCP allow 30 days for a party to respond, then the discovery must be submitted at least 30 days prior to the deadline for completion of discovery. Additionally, each party will be permitted to seek 35 Interrogatories. Each party will also be permitted to seek Twenty (20) depositions.

Motions to compel discovery are to be filed and served by the discovery deadline or within 30 days of the default or service of the response, answer, or objection which is the subject of the motion if the default occurs within 30 days of the discovery deadline, unless the time for filing of such motion is extended for good cause shown, or any objection to the default, response, or answer shall be waived.

The parties are reminded that pursuant to Local Rule 7(a)(1)(A) and (a)(1)(B), all motions, except motions pursuant to FRCP 12, 56, 59, and 60, shall be accompanied by a proposed Order and a Certificate of Consultation.

The opposing party may file a response to any motion filed in this matter. Neither party may file an additional reply, however, without leave of the court. If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

The parties may consent to trial before the Magistrate Judge. The Magistrate Judge can normally provide the parties with a definite trial date that will not be continued unless a continuance is agreed to by all parties, or an emergency arises which precludes the matter from proceeding to trial.

The parties are encouraged to engage in court-annexed attorney mediation or private mediation on or before the close of discovery.

This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this Order will not be modified or extended.

IT IS SO ORDERED.




S. THOMAS ANDERSON
United States Magistrate Judge

Date: May 11, 2005

APPROVED FOR ENTRY:

SPRAGINS, BARNETT, COBB & BUTLER, PLC

By: 

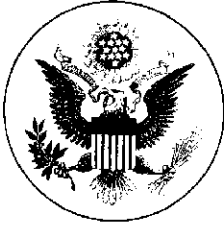
LEWIS L. COBB #005369
CLINTON H. SCOTT #23008
Attorney for Plaintiffs
P.O. Box 2004, 312 East Lafayette Street
Jackson, TN 38302
(731) 424-0461

McNABB, BRAGORGOS & BURGESS

By: 

PAM WARNOCK GREEN #10407
Attorney for Defendant
Sixth Floor, 81 Monroe Avenue
Memphis, TN 38103
(901) 624-0640

FILED
MAY 12 2005
CLERK OF COURT



Notice of Distribution

This notice confirms a copy of the document docketed as number 12 in case 1:04-CV-01313 was distributed by fax, mail, or direct printing on May 12, 2005 to the parties listed.

Clinton H. Scott
SPRAGINS BARNETT COBB & BUTLER
312 East Lafayette St.
Jackson, TN 38302--200

Lewis L. Cobb
SPRAGINS BARNETT COBB & BUTLER
312 East Lafayette St.
Jackson, TN 38302--200

Pam Warnock Green
MCNABB BRAGORGOS & BURGESS, PLLC
81 Monroe Ave.
Sixth Floor
Memphis, TN 38103--540

Honorable James Todd
US DISTRICT COURT